

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO WOMEN IN TRADES,)	
)	
Plaintiff,)	
)	No. 25 C 2005
v.)	
)	Judge Kennelly
PRESIDENT DONALD J. TRUMP, <i>et al.</i> ,)	
)	
Defendants.)	

**AGREED MOTION OF DEFENDANTS
FOR ENTRY OF CONFIDENTIALITY ORDER**

Defendants, through undersigned counsel, request that the court enter a confidentiality order modeled on the court's Form LR 26.2 Model Confidentiality Order and revised as agreed by the parties, and in support of this motion states as follows:

1. The parties have agreed to the proposed confidentiality order as a means to avoid a discovery dispute concerning business records of non-plaintiff federal grantees that plaintiff seeks in discovery.

2. The proposed confidentiality order will permit the parties to complete outstanding discovery requests more efficiently because it eliminates any arguable need for defendants to redact these business records based on claims of proprietary business information or confidentiality.

3. The proposed confidentiality order provides that it is without prejudice to the rights of any party or interested member of the public to make any objection to the designation of records as confidential.

4. The parties have created the proposed confidentiality order by modifying the court's model confidentiality order and by tracking all deletions and additions to the model text.

5. Two copies of the proposed confidentiality order will be submitted to the court by email in accordance with the court's case procedures: one track-changes copy and one "clean" copy incorporating all the parties' proposed revisions.

6. The undersigned AUSA contacted plaintiff's counsel regarding this motion and confirmed that there is no objection.

WHEREFORE, defendants request that the court enter the confidentiality order sent to the court's proposed order email inbox, which the parties have modeled on the court's Form LR 26.2 Model Confidentiality Order and revised by agreement.

Respectfully submitted,

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